

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

**COMMONWEALTH OF PUERTO RICO,
et al.,**

Defendants.

CIVIL NO. 12-2039 (GAG)

**MOTION FOR EXTENSION OF TIME TO FILE MOTION IN COMPLIANCE WITH
ORDER AT DOCKET NO. 1134**

TO THE HONORABLE COURT:

COMES NOW Defendants Commonwealth of Puerto Rico and Puerto Rico Police Department (“Defendants” and/or “PRPB”), by and through the undersigned counsel, and respectfully inform the Court as follows:

1. On March 4, 2019, the Court ordered the parties and the Technical Compliance Advisor (“TCA”) “to meet and to report to the Court no later than March 20, 2019, an effective plan of action geared to resolving” alleged deficiencies in the PRPB’s information technology systems. Docket No. 1134.
2. Upon a joint request for clarification, the Court clarified that the joint filing should include a report on the status of the PRPB’s information technology systems (“ITS”) and a proposed date by which the parties would file the plan of action requested by the Court.
3. On March 15, 2019, as part of broader discussions on the TCA’s methodology for measuring compliance, the parties and the TCA met and discussed generally the status of the ITS implementation, as well as saw a live presentation of the CAD platform in use.

4. The PRPB has employed its best efforts to prepare a comprehensive ITS status update which reflects the current state and progress of the implementation of the ITS, and that can be shared and discussed with the TCA and the US DOJ in order to file jointly, per the Court's order. The PRPB requires a brief extension of time to comply with the Court's order.
5. Accordingly, the PRPB hereby requests a brief extension of time, until Monday, March 25, 2019, to afford the PRPB the opportunity to prepare a full and complete status report on the progress the PRPB has made in implementing its ITS pursuant to the Agreement for the Sustainable Reform of the Puerto Rico Police Department (Docket No. 60), as well as to meet with the TCA and the US DOJ to discuss the report and agree on a date for submission of the ITS plans of actions.
6. The PRPB discussed the instant petition with counsel for the USDOJ and with the TCA's office, both of whom expressed no objection to the PRPB's motion for extension of time.
7. This request is in good faith and not to delay these proceedings.

WHEREFORE, Defendants respectfully requests the Court GRANT the above and afford the PRPB an extension of time until March 25, 2019 to comply with its Order (Docket No. 1134), with any additional relief it deems just and proper.

RESPECTFULLY SUBMITTED.

WE HEREBY CERTIFY: That today we have electronically filed the foregoing document with the Clerk of the Court for the District of Puerto Rico, using the CM/ECF system which will send a copy and notification of filing to all counsel of record.

In San Juan, Puerto Rico, this 20th day of March, 2019.

By:

s/ Maria A. Dominguez

Maria A. Dominguez
USDC-PR No. 210908
madt@mcvpr.com

s/ Arturo J. Garcia Sola
Arturo J. Garcia Sola
USDC-PR No. 201903
ajg@mcvpr.com

s/ Javier Micheo Marcial
Javier F. Micheo Marcial
USDC-PR No. 305310
jfmm@mcvpr.com

McCONNELL VALDÉS LLC
PO Box 364225
San Juan, PR 00936-4225
Telephone (787) 250-5641
Fax: (787) 759-8282